

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROBERT P. GOODRICH,

Petitioner,

v.

TIM HALL,

Respondent.

Civil Action No. 03-12541-NG

**ASSENTED-TO MOTION FOR LEAVE TO IMPOUND
PETITIONER'S REPLY MEMORANDUM IN SUPPORT OF
ISSUANCE OF WRIT OF HABEAS CORPUS**

Petitioner, Robert P. Goodrich, through counsel, hereby respectfully moves, pursuant to Local Rule 7.2, that the Court impound Petitioner's Reply Memorandum in Support of Issuance of Writ of Habeas Corpus. In support of his motion, Petitioner states as follows:

1. On April 6, 2004, this Court granted Respondent's Assented-To Motion to Impound Supplemental Answer.
2. Respondent's Assented-To Motion to Impound Supplemental Answer was based on the fact that Petitioner's brief and appendix filed in the Massachusetts Appeals Court, in connection with Commonwealth v. Robert P. Goodrich, Middlesex County Superior Court Criminal Action No. 2000-00018, included impounded grand jury testimony.
3. This Court has previously granted assented-to motions to impound Petitioner's Opposition to Respondent's Motion to Dismiss and Petitioner's Memorandum in Support of Issuance of Writ of Habeas Corpus on May 1, 2004 and July 22, 2004, respectively, each of

which referenced the above-mentioned impounded grand jury testimony.

4. Petitioner's Reply Memorandum in Support of Issuance of Writ of Habeas Corpus references the above-referenced grand jury testimony.

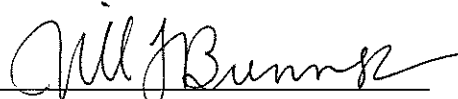
5. Respondent's counsel assents to the filing of this motion.

6. Pursuant to Local Rule 7.2(a), Petitioner represents that the impoundment order may be lifted upon the Court's disposition of the subject habeas petition, and all impounded materials may be returned to the Petitioner.

WHEREFORE, for the foregoing reasons, Petitioner respectfully requests that this Court impound Petitioner's Reply Memorandum in Support of Issuance of Writ of Habeas Corpus, which will be filed on or before October 8, 2004, pursuant to Petitioner's Assented-to Motion for Enlargement of Time to File Reply Memorandum.

Respectfully submitted,


ROBERT P. GOODRICH,
By his attorneys,


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Dated: October 5, 2004

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that on October 5, 2004, I did confer in good faith with Maura D. McLaughlin, Esq., counsel for Respondent, in an effort to narrow or resolve the issues raised in this motion, and counsel for Respondent has indicated that she assents to this motion.


Jill L. Brenner